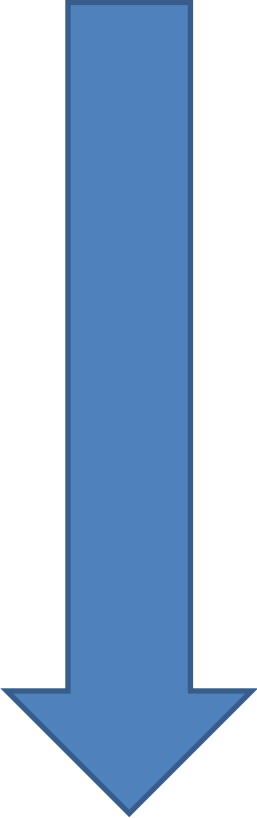


Administrative Review Training

Maine Department of Education
Child Nutrition Staff
September 14, 2017

Review Timeline



Letter notifying Superintendent
Off-Site Documentation
Pre-review Phone Call
On-site Review
Review Report/Corrective Action Plan
SFA response to corrective action
Final letter to close review



Review Frequency & Terms

Frequency

- SFA must be reviewed every 3 years*

Review Period

- Most recent month claim submitted

Menu Week of Review

- Menu review for 5 consecutive days from review period

Day of Review

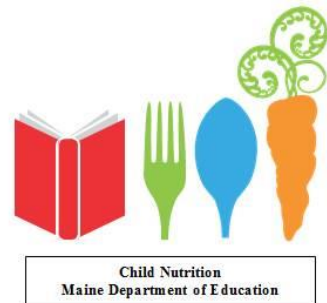
- On-site Review



Off Site Paperwork


Required documents:

- Off site assessment tool
- District information form
- Pre-visit information packet



Child Nutrition Website

[Maine.gov](#) [Agencies](#) | [Online Services](#) | [Help](#) |



[Maine DOE Home](#) | [Students & Families](#) | [Teachers](#) | [Administrators](#) | [Communities](#) | [Inside DOE](#)

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[Home](#) → [Child Nutrition](#) → [Administrative Reviews](#)

Child Nutrition Home

Programs

Online Claims

Forms

Data & Reporting

Financial

Laws & Rules

Resources

Calendar of Events

Contact

Administrative Reviews

The Administrative Review provides a comprehensive evaluation process for State Agencies (SAs) to evaluate local school districts, Summer Food Service Programs and residential child care institutions that operate the school meals programs. The review process includes both Critical and General Areas of Review and offers a more robust review of program operations. This includes the implementation of the Healthy Hunger Free Kids Act (HHFKA) program requirements and the review of other Federal programs. Food and Nutrition Service provides forms, instructions, and guidance to standardize this review process to State Agencies. Programs are reviewed at least once every three years. Follow-up reviews and high risk districts reviews may be necessary in addition to the three year cycle.

Request a Copy of an Administrative Review

To request a copy of the most recent Administrative Review conducted by the State Agency as required by Public Law 111-296, [Click Here](#) and provide the district name.

SY 2018 Review Schedule

Please see the [School Review Schedule SY 2018](#) (pdf) to mark your calendar and use the following documents to inform and prepare for the review process.


Required Documents to Submit

- [Off Site Assessment Tool](#)
- [SY 2018 Administrative Review District Information Form](#)
- [SY 2018 Administrative Review Pre-Visit Information Packet](#)

[Off Site Assessment Tool- Instructions for State Agency](#)

Preparing for the Review

- [Administrative Review Checklist](#) (doc, 37KB)
- [Administrative Review timeline](#) (RTF, 74KB)
- [Dietary Specification Assessment Tool](#) 2016-2017(XLS, 148KB)
- Preparing for an Administrative Review



Child Nutrition
Maine Department of Education

On Site Sample Schedule For Two Day Review

Day One

- Arrive at Director's office and review applications, verification & paperwork
- Prior to lunch service, arrive at the kitchen to observe documents, production, and meal service
- Verify accountability
- Continue review of paperwork
- Review ASSP if applicable

Day Two

- Arrive at second school and observe breakfast
- Review financials and finish paperwork
- Review FFVP if applicable
- Observe lunch at second school
- Exit interview with superintendent/designee



Review Areas

- Meal Access & Reimbursement*
 - Performance Standard 1
- Meal Pattern & Nutritional Quality*
 - Performance Standard 2
- Resource Management
- General Program Compliance
- Other Federal Program Reviews



**Fiscal
Action**

PS1: Meal Access & Reimbursement

Certification & Benefit Issuance

Verification

Meal Counting & Claiming

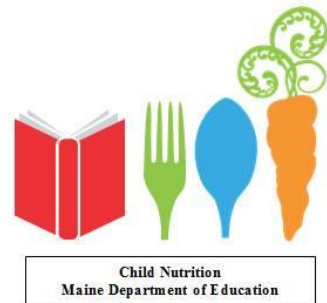
Verifying that meals claimed for reimbursement were served only to eligible students.



PS1: Meal Access & Reimbursement

Certification & Benefit Issuance:

Reviewing the certification of meal benefits to ensure eligible students receive the meal benefits for which they are entitled and the claims for federal reimbursement are valid



Question

How long does the applications approval take from the date the SFA receives the application from the household?

Certification and Benefit Issuance

Off-site

- Answer questions in Off-site Assessment: #100-121
- Send benefit issuance file (Excel)
- Send additional documentation



On-site

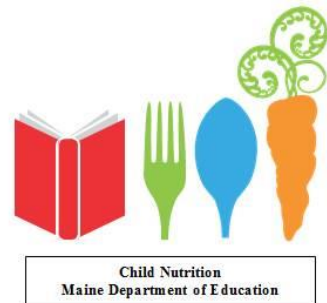
- Review student eligibility documents
 - Applications
 - DC lists
 - Letters
- Review denied applications



Benefit Issuance Documentation

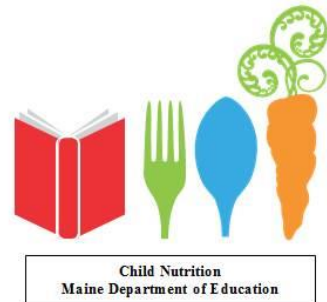
Electronic list (Excel) of all free and reduced priced students in the district

- Do not include withdrawn or paid students
- List to be pulled from the Point of Service (POS)
- List should be pulled during the Review Period/Review Month



Benefit Issuance Documentation

- Student Name
- Eligibility Status
- Method of approval (Income, Foster, DC, ...)
- Date of approval



Off-site Benefit Issuance Documentation

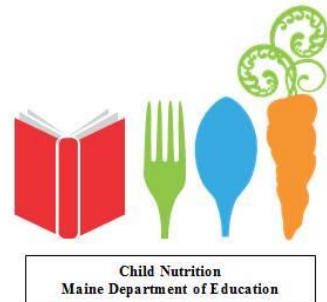
Sample Benefit Issuance List

Student Name	Benefit Status	Method of Certification	School Name	Approval Date
Walter Beesley	F	DC	Smith ES	9/2/2015
David Hartley	R	Income Application	Harrison MS	8/30/2015
Sarah Platt	F	SNAP Application	Jones HS	9/10/2015
Gail Lombardi	F	Foster	Jones HS	9/2/2015



On-site Benefit Issuance Documentation

- Approved meal benefit applications
- Denied meal benefit applications
- Direct certification lists
- Homeless/migrant/Head Start lists



Question

- How are eligibility determinations transferred to the benefit issuance document?

Question

- How are benefit issuance document(s) transferred to the point of service system?

Common Review Findings

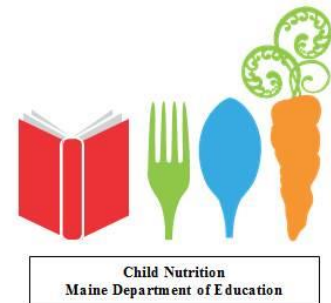
- ✓ 30 day carryover not implemented correctly
- ✓ Incomplete Applications
- ✓ Miscategorized Applications- math errors
- ✓ Incorrect SNAP/TANF number
 - ✓ Format must be 8 digit plus letter
- ✓ Missing documentation (Keep ALL DC lists)
- ✓ Not converting to annual income when different frequencies of income are reported
- ✓ Incorrect non-discrimination statement on letter sent home

\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$



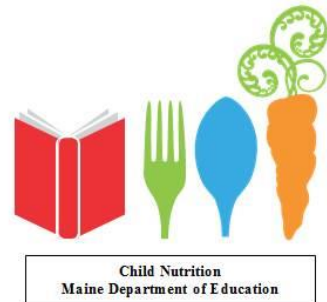
PS1: Meal Access & Reimbursement

Verification



Verification

- Was it completed on time?
- Used correct method (error prone)
- Compare verification report to documentation
- Follow-ups were made (use tracking form)
- Notification letter met standards
- Eligibility status changes



Verification

Internal Use Only

HOUSEHOLD FILE CONTROL FORM

Head of Household Name: _____

Date Selected: _____ Notification Sent: _____

Response Due: _____ Second Notice Sent: _____

Response Due: _____ Missing Information: _____

DOCUMENT ALL TELEPHONE CONTACTS ON REVERSE SIDE OF THIS PAGE.

Date Reduction/Termination Notice Sent: _____

Food Stamp/TANF Household Income Household: \$ _____ Monthly

Confirmed By - Confirmed by -

☐ Predetermined Eligibility List ☐ Wage stubs

☐ Food Stamp/TANF Office ☐ Written documents (Explain below)

☐ ATP Card ☐ Collateral Contacts (Explain below)

☐ Other: _____ ☐ Agency Records

☐ Eligibility not confirmed ☐ Other: _____

Explanation: _____

Verification Result:

☐ No Change ☐ Reduced to Free ☐ Free to Reduced ☐ Ineligible

Reason For Change: ☐ High Income ☐ Refused to Cooperate
 ☐ Food Stamp/TANF Eligibility Not Confirmed
 ☐ Other - include self denial

Signature of Verifying Official: _____

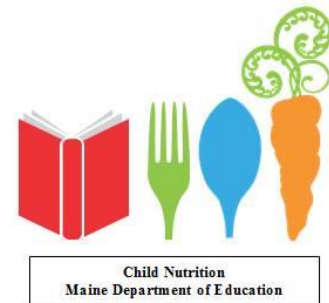
Date: _____

Verification Notification and Tracking Forms
www.maine.gov/doe/nutrition/forms/index.html



Common Verification Errors

- ✓ Did not use the correct method
 - Must be error prone unless receive permission
 - Mark the Error prone applications when approving
- ✓ Incorrect sample size- double check the math!
 - A family application who is on direct cert is NOT included in the number of applications
- ✓ Not following timeline protocol
- ✓ Eligibility changes not made timely
- ✓ Incorrect math used with paystub



PS1: Meal Access & Reimbursement

Meal Counting & Claiming

- Electronic or Manual System
- A point of service system that accurately counts reimbursable meals by category (F/R/P) at each school
- Reimbursable meals were consolidated at each school and at the SFA
- Correct meal counts were used in the Claim for Reimbursement



Meal Counting and Claiming

Off-site



On-site

- Answer questions in Off-site Assessment
 - Type of System Used
 - Back up system
 - Training
- Review Claim from the *Review Period*

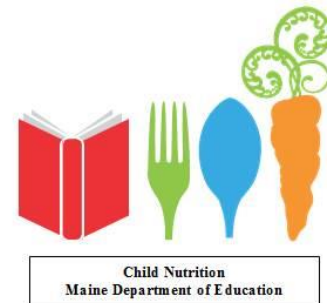
- Meal counts by day for review month
- Edit checks
- Observe POS procedures
- Meal counts for day of review



Meal Counting and Claiming

Off-Site Questions

- Electronic or Manual POS System or a combination
- How does the POS system identify a student's eligibility?



Meal Counting and Claiming

Off-Site Questions

- What type of back-up system is in place?
- How often are cashiers and substitute cashiers trained?
- At the end of meal service, how does the SFA obtain daily meal counts by category from the POS?



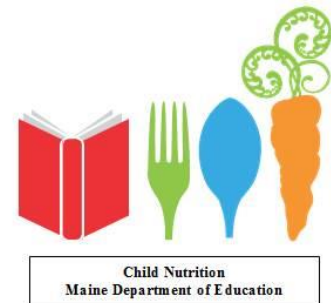
Meal Counting and Claiming

- Offer versus Serve
- Incomplete Meals
- Second Meals
- Visiting Student Meals
- Adult/Non-student Meals
- Student Worker Meals
- A la carte Sales
- Field Trips
- Lost/forgotten IDs/Tickets
- Charging/Pre-paid Meals
- Students without funds
- New students without approved benefits



Meal Counting and Claiming

- What internal controls are in place to ensure meal counts do not exceed enrollment or attendance adjusted enrollment?



Edit Checks

4	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
5	Eligible Free:	176		Eligible Reduced:		35		Attendance Factor:		95%		Elementary		95%		
6												Secondary		93%		
7																
8	YEAR	STUDENT LUNCH/EDIT CHECKS							ADULT LUNCHES		TOTAL		PRE K/K MILK PROGRAM		COMMENTS	
9		Maximum	168	Maximum	34			TOTAL					ELIGIBLE			
10	MONTH	Free:	WORKERS	Reduced:	WORKERS	PAID	PAID	MEALS TO	ADULT	OTHER	MEAL	MILK	FREE	PAID	ADULT	
11		FREE	FREE	REDUCED	REDUCED	PAID	PAID	CHILDREN	WORKERS	ADULTS	COUNT	SERVED	FREE	PAID	ADULT	
12	DATE															
13																
14	08/30/17	125	0	22	0	50	0	197	2	4	203					
15	08/31/17	110	0	23	0	55	0	188	2	3	193					
16	09/01/17	136	0	25	0	53	0	214	2	3	219					
17	09/05/17	135	0	21	0	59	0	215	2	4	221					
18	09/06/17	127	0	21	0	62	0	210	2	4	216					
19	09/07/17	160	0	22	0	51	0	233	2	4	239					
20	09/08/17	155	0	25	0	50	0	230	2	3	235					
21	09/11/17	153	0	27	0	49	0	229	2	1	232					
22	09/12/17	157	0	20	0	55	0	232	2	4	238					
23	09/13/17	132	0	29	0	53	0	214	2	5	221					
24	09/14/17	169	0	29	0	52	0	250	2	4	256					
25	09/15/17	152	0	30	0	59	0	241	2	4	247					
26	09/18/17	200	0	33	0	62	0	295	2	6	303					
27	09/19/17	136	0	34	0	63	0	233	2	4	239					
28	09/20/17	135	0	26	0	65	0	226	2	3	231					
29	09/21/17	127	0	35	0	57	0	219	2	1	222					
30	09/22/17	160	0	33	0	52	0	245	2	2	249					
31	09/25/17	155	0	27	0	51	0	233	2	4	239					
32	09/26/17	153	0	20	0	56	0	229	2	4	235					
33	09/27/17	157	0	29	0	59	0	245	2	5	252					
34	09/28/17	132	0	29	0	60	0	221	2	3	226					
35	09/29/17	169	0	30	0	61	0	260	2	2	264					
36								0			0					
37	TOTALS:	3235	0	590	0	1234	0	5059	44	77	5180	0	0	0	0	
38																
39																
40																
41																
42																
43																



Meal Counting and Claiming

Alternate Points of Service

- Must be approved by SA
- Mobile Cart/Pre-K Classroom/Alternative School

Multiple Lines

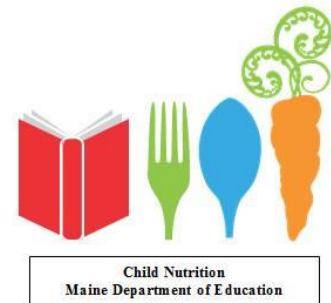
- How do you prevent duplicate meals from being claimed?



Meal Counting and Claiming

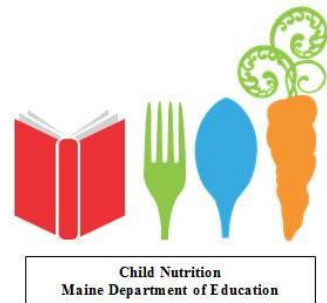
On-Site Procedures

- Validating information on SFA-SA Agreement
- Validate Claim for Reimbursement
- Observe POS Procedures
 - Oversight at POS ensuring accurate meal counts
 - Eligibility Category
 - Without Overt Identification
 - Alternate locations (classroom)



Meal Counting & Claiming: Common Findings

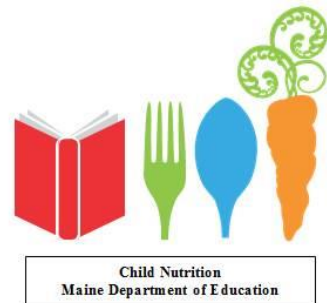
- Lack of oversight by a trained person at POS
- Alternate locations (Pre-K meals or Breakfast in the Classroom)
 - Train teachers
 - Must offer two types of milk
 - Consistent monitoring to ensure requirements are being followed



Meal Counting and Claiming

Corrective Action

- Describe in detail how the finding was corrected
- Fiscal Action for inaccurate meal counting



PS2: Meal Pattern & Nutritional Quality

Meal Components & Quantities
Offer vs. Serve

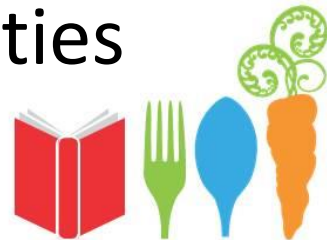
Dietary Specifications & Nutrient Analysis



PS2: Meal Pattern & Nutritional Quality

SFAs agree to:

- Offer students the required meal components in the required quantities
- Allow students to select required meal components on all reimbursable lines
- Record/claim only those meals that contain required components in required quantities



PS2: Meal Pattern & Nutritional Quality

Off-site



On-site

SFA will send:

- Menus
- Completed production records
- Component crediting documentation
- Recipes, labels, etc.

- Observe breakfast & lunch preparation
- Observe breakfast & lunch service
- Validate the off-site review

Reviewer:

- Meal Compliance Tool
- Dietary Specifications Tool



Meal Components & Quantities

Off-Site: Documentation

- Menu (breakfast, lunch)
- Menu Production Records (complete)
- Standardized Recipes – food component contribution, ingredients, serving size, yield
- Crediting Information
 - Nutrition Labels (ingredients and nutrition facts)
 - Child Nutrition (CN) Labels
 - Manufacturer's Product Formulation Statements
- Review before submitting – can you determine how everything credits?
- Submit by date due to reviewer



Meal Components & Quantities

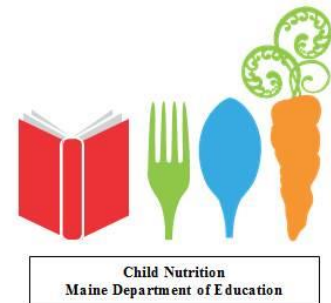
Off-Site: Documentation

Organize documentation in order by day

Monday's Menu: *Breaded Chicken Patty on a WG Bun, Broccoli, Carrot Sticks, Strawberry Cup, Milk Choice*

Folder should contain:

- Completed PR from Monday
- Product documentation including:
 - CN label for Chicken Patty
 - Ingredient & nutrition facts label for the roll
 - Indication of serving size on PR for fruits & vegetables
 - Labels for milk



On-Site: Meal Components & Quantities

Meal Observation – Day of Review

Prior to Meal Service

- Will the meal pattern be met?
- Review menu & production records
- Review 'general areas'

During Meal Service

- Observe POS
- Checking that meals claimed are done so correctly

After Meal Service

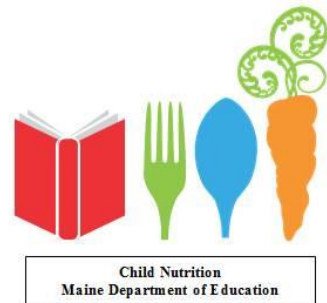
- Obtain meal counts by eligibility



Meal Components and Quantities

Offer Versus Serve

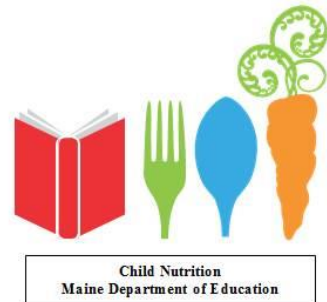
- Signage explaining how to select a reimbursable meal – include requirement to select $\frac{1}{2}$ cup f/v
- Staff at POS trained and able to recognize a reimbursable meal



Meal Components and Quantities

Dietary Specifications & Nutrient Analysis

- Dietary Specifications Tool (reviewer)
- Determines if Nutrient Analysis is necessary
- Based on menu documentation submitted and on-site observation



Meal Components & Quantities

Common Findings

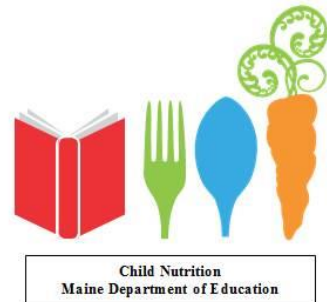
- ✓ Insufficient quantities of a component offered
- ✓ Missing meal components
- ✓ OvS not implemented correctly
- ✓ Unallowable milk substitutions
- ✓ Incomplete production records
- ✓ Lack of Standardized Recipes
- ✓ Field Trip/Bag Lunches – accountability & meal pattern



Meal Components & Quantities

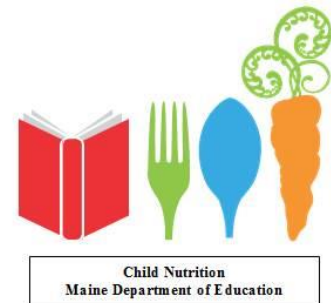
Corrective Action

- Describe in detail how the finding was corrected
- Attach Documentation
- Fiscal Action for missing meal components and some repeat violations



Recommendations

- ✓ Check menu & production records
 - ✓ Daily/weekly minimums
- ✓ Credit components correctly
- ✓ Observe meal service
 - ✓ Is the kitchen following the meal as planned?
 - ✓ Can staff accurately identify a reimbursable meal at the POS?
- ✓ Plan a 2/2 every day & ask what if?



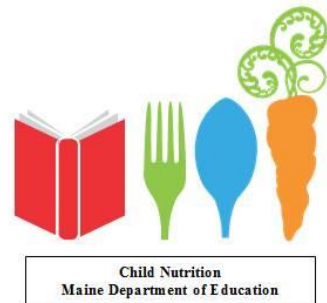
Water

- Free, potable water must be available to students
 - Breakfast
 - Lunch



Production Record Activity

- Pretend you are the reviewer!
- Answer questions based on the production record, recipes and labels



Sample Deli Bar Record

Start	End	Serv	recipe & ingredients (offered)	G: EACH	serving notes	Time/ Temp
			005094 Deli Bar (b) 050426 TURKEY, BREAST, DELI-STYLE, COOK 360901 HAM,DICED,CKD,97% FF-COMMODITY 015121 TUNA,LT,CND IN H2O,DRND SOL----- 902169 CHICK,DICED,CKD,FROZEN-COMMOD 001129 EGG,WHL,CKD,HARD-BOILED----- 900014 Bacon----- 051435 CHEESE, AMERICAN, PASTEURIZED, 001009 CHEESE,CHEDDAR----- 011251 LETTUCE,COS OR ROMAINE,RAW----- 011529 TOMATOES,RED,RIPE,RAW,YEAR RN 011333 PEPPERS,SWEET,GREEN,RAW----- 009193 OLIVES,RIPE,CND (SMALL-EXTRA LRG 011282 ONIONS,RAW----- 011937 PICKLES,CUCUMBER,DILL----- 096140 Mayonnaise,Kraft Lite:Kraft----- 083730 MUSTARD YELLOW PREPARED----- 902948 DRESSING,CAESAR----- 902900 Bread, Whole Wheat Sub Roll Fanitini----- 901928 Bread, Hamburg roll WG----- 902876 Wrap, Whole Wheat 12"-----		Sandwiches must have 2 Meat/Alt 1.6 oz Turkey = 1 oz Meat 1.2 oz Ham = 1 oz Meat 1 Egg = 2 oz Meat 2 slice Am Chz = 1 oz Meat 1 oz Tuna or Chicken Salad = 1 oz Meat Bacon = EXTRA (does not count)	



Sample Salad Bar Record

Start	End	Serv	recipe & ingredients (offered)	G: SERVING	serving notes	Time/ Temp
			000399 Salad Bar Week High (b)			
		✓	011251 LETTUCE,COS OR ROMAINE,RAW-----		Everyday offer all vegetable subgroups	
		✓	011457 SPINACH,RAW-----		Plus at least one type of whole fruit	
		✓	011960 CARROTS,BABY,RAW-----		At least 1 CUP must be Offered	
		✓	900161 TOMATOES, CHERRY FRESH-----		Min. of 1/2 Cup Fruit and/or Veg Taken	
		✓	011205 CUCUMBER,WITH PEEL,RAW-----		--Vegetable Subgroups--	
		✓	011090 BROCCOLI,RAW-----		DARK GREEN	
		✓	011143 CELERY,RAW-----		RED/ORANGE	
		✓	011333 PEPPERS,SWEET,GREEN,RAW-----		STARCHY	
		✓	011182 CORN,YEL,WHL KERNEL,FRZ,THAWE		OTHER	
		✓	011313 PEAS,GRN,FRZ,CKD,BLD,DRND,W/O/S		LEGUME	
		✓	011112 CABBAGE,RED,RAW-----			
		✓	011609 BEETS,PICKLED,CND,SOL&LIQUIDS---		2 oz equivalent Meat / Meat Alternate	
		✓	799958 BEANS, CANNED, KIDNEY, LOW-SODI		2 oz equivalent Grain	
		✓	000801 BEANS GARBANZO ,CANNED-----			
		✓	009003 APPLES,RAW,WITH SKIN-----		4 oz Yogurt = 1 oz equivalent Meat Alternate	
		✓	009200 ORANGES,RAW,ALL COMM VAR-----			
		✓	009181 MELONS,CANTALOUPE,RAW-----			
		✓	009148 KIWI FRUIT,(CHINESE GOOSEBERRIE			
		✓	009240 PEACHES,CND,LT SYRUP PK,SOL&LIQ			
		✓	009269 PINEAPPLE,CND,LT SYRUP PK,SOL&LI			
		✓	900401 APPLESAUCE,CND,UNSWTND,W/ VIT			
		✓	900618 Cheese, String, LOL-----			
		✓	001129 EGG,WHL,CKD,HARD-BOILED-----			
		✓	080533 YOGURT, LOWFT STRAW-----			
		✓	903064 Croutons, Whole Grain -----			
		✓	901951 Dressing, Italian Lite (Kens)-----			
		✓	901950 Dressing, Ranch Lite (Kens)-----			
		✓	901952 Dressing, Olive Oil Vinaigrette Lite (Kens)			

Sample Complete Production Record

Lunch Production Record																										
Date: <u>9 / 27 / 2015</u> Preparation Site: <u>DOE High School</u> QvS: Yes <u>X</u> No <u> </u> Grades <u>9-12</u>			Menu: Shepherd's Pie w/ WG Biscuit or Deli Bar Salad Bar Grapes Mixed fruit Milk Variety										LUNCH TOTALS <table border="1"> <tr> <th></th> <th>MEALS PLANNED</th> <th>MEALS SERVED</th> </tr> <tr> <td>STUDENT MEALS</td> <td></td> <td></td> </tr> <tr> <td>ADULT MEALS</td> <td></td> <td></td> </tr> <tr> <td>TOTAL MEALS</td> <td></td> <td></td> </tr> </table>			MEALS PLANNED	MEALS SERVED	STUDENT MEALS			ADULT MEALS			TOTAL MEALS		
	MEALS PLANNED	MEALS SERVED																								
STUDENT MEALS																										
ADULT MEALS																										
TOTAL MEALS																										
MENU ITEMS AND CONDIMENTS	RECIPE OR PRODUCT (Name or #)	SERVING SIZE/UTENSIL	TEMPS		COMPONENT CONTRIBUTIONS										ACTUAL SERVINGS		AMOUNT LEFTOVER	PRODUCTION NOTES								
			After Cook	Start of Service	Meat/MA	Grain/ Bread	Fruit	Dark Green Vegetables	Red/Orange Vegetables	Legumes	Starchy Vegetables	Other Veg	Total Vegetables	Student	Adult/ A la Carte											
Deli Bar:																										
Sliced Ham	USDA	1.22 oz			1													Sandwiches with no cheese (meat)								
Sliced Turkey	USDA	1.6 oz			1													get double meat (cheese).								
American Cheese	USDA, .5 oz ea	2 slices			1																					
Provolone Cheese	Cheese Head, 1 oz	1 slice			1																					
WG Sandwich Bread	CK #546, 28g/slice	2 slices				2																				
WG Sub Roll	CK #269, 70g ea	1 ea				2.5																				
WG Wrap, 10"	Wrappy, 56g	1 ea				2																				
Shepherd's Pie	USDA D-43	1 piece			2							¾ c	¾ c													
WG Biscuit	Pbx #5495	1 each				2																				
Salad Bar	SB recipe #1	1 Cup						.5	.5	.5	.5	.5	2.5													
Mixed fruit, canned	USDA	¾ cup					.5																			
Grapes, fresh	Apple Farm	¾ c					.5											~14 = ¾ cup								
Salad Dressing, if	Recipe #102	2T																								
Minimum Daily Lunch Component Totals					2	2	1	.5	.5	.5	.5	.5	2.5	Notes: This is a sample production record that a Director would give to kitchen staff to complete on the day of service.												
Weekly component Totals																										



Resource Management

Maintenance of the non-profit school food
service account

Paid Lunch Equity

Revenue from Non-program Foods



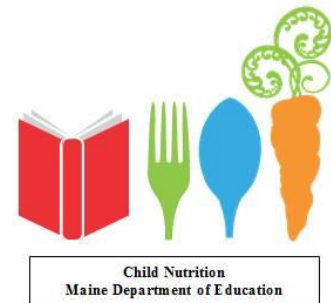
Indirect Costs

Procurement



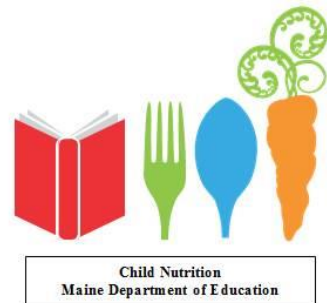
Maintenance of Non-Profit School Food Service Account

- Only allowable costs are charged to the food service account
- Documentation of program revenues and expenses
 - Income and expense detail report
 - Sample of invoices/timecards



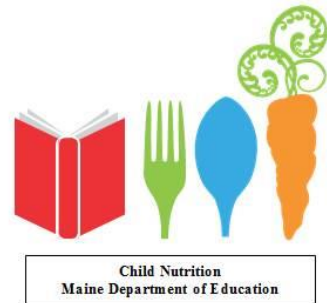
Paid Lunch Equity

- Was the paid lunch equity tool completed correctly?
- Was the minimum weighted average price charged?
- Did the SFA use non-federal funds?
 - If so, need to do more in depth review in this area



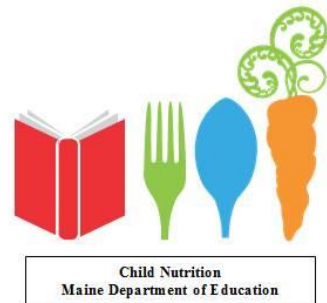
Revenue from Non-Program Foods

- Applies to: a la carte, catering, vending, school stores, adult meals, etc.
- What is the procedure and controls for ensuring all revenue is deposited into the food service account?



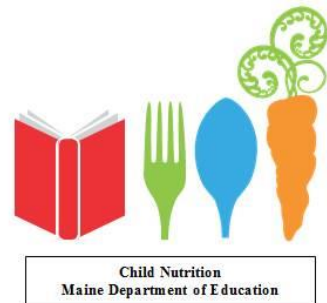
Adult Meals & Pricing

- Price must be greater than per meal cost
 - If not, difference must be offset by non-federal funds (i.e. town support, general fund)
- Only food service staff may receive free meals



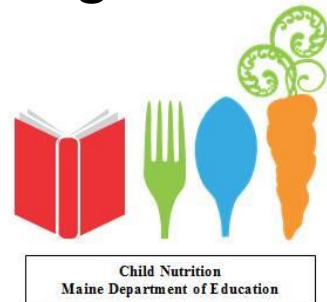
Indirect Costs

- Cannot charge indirect costs to food service program
- Includes:
 - Utilities (propane) unless separate meter
 - Percentage of staff time to food service account
 - i.e. custodian, van driver



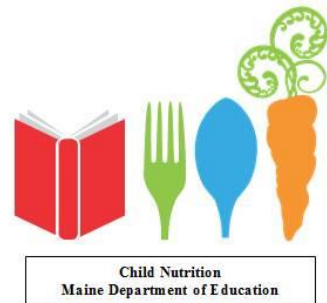
Procurement

- Purpose: open and fair competition of purchasing
- What is your district's procurement policy and written code of conduct?
- What is your district's small purchase threshold?
 - The maximum dollar amount of purchase before going to bid.
 - Maine SPT is \$10,000



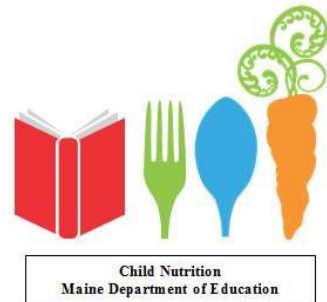
Procurement

- Informal purchasing
 - Micro purchase
 - Small purchase
- Formal purchasing
 - Bids



Common Findings

- Paid lunch equity tool not done correctly
- Not reporting costs accurately
- Propane, utilities (indirect costs) charged correctly to program
- Procurement practices (new review area)



General Program Compliance

1. Civil Rights
2. Food Safety
3. Local Wellness Policy
4. Competitive Foods
5. Water
6. SFA On-site monitoring
7. Reporting and Recordkeeping
8. Other Program Reviews (FFVP, ASSP)



Civil Rights

First item we look for
and so should you...

- Posted where your customers can see it
- Make sure you have the newest copy!



USDA United States Department of Agriculture

AND JUSTICE FOR ALL

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Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible State or local Agency that administers the program or USDA's TARGET Center at (202) 725-3802 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-6638. Additionally, program information is available in languages other than English.

To file a complaint alleging discrimination, complete the USDA Program Discrimination Complaint Form, AD-1027, found online at http://www.usda.gov/complaint_filing_cust.html, or at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (800) 822-9992. Submit your completed form or letter to USDA by:

mail:
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410

fax:
(202) 690-7442; or
email:
program.intake@usda.gov

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Las personas discapacitadas que requieren medios alternos para que se les comunique la información de un programa (por ejemplo, braille, letra agrandada, grabación de audio, lenguaje de señas seleccionadas, etc.) deberán comunicarse con la agencia estatal o local responsable de administrar el programa o al TARGET Center del USDA al (800) 725-3802 (voz y TTY) o comunicarse con el USDA a través del Servicio Federal de Transmisión de Información al (800) 877-6638. La información del programa también está disponible en otros idiomas además del inglés.

Para presentar una queja por alegada discriminación, complete el formulario de queja por discriminación del programa del USDA, AD-1027, que podrá encontrar en línea en http://www.usda.gov/complaint_filing_cust.html, o envíe una carta dirigida al USDA que incluya toda la información solicitada en el formulario. Para solicitar una copia del formulario de presentación de quejas, comuníquese al (800) 822-9992. Envíe su formulario o carta completa al USDA por correo:

U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410

fax:
(202) 690-7442; o
correo electrónico:
program.intake@usda.gov

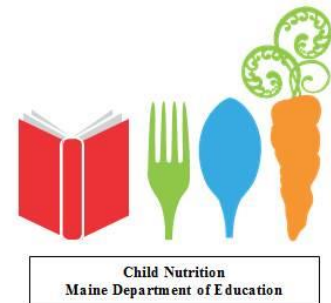
Esta institución ofrece igualdad de oportunidades.

AD-1027 (Rev. 10-2014) (English) (Spanish) (Chinese) (Vietnamese) (Haitian Creole) (Tagalog) (Korean) (Japanese) (Filipino) (Vietnamese) (Haitian Creole) (Tagalog) (Korean) (Japanese) (Filipino)



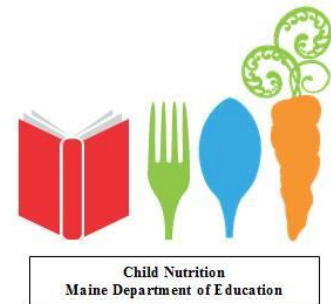
Civil Rights

- “And Justice for All” poster
- Non-discrimination statement
 - Need permission to use short statement
- Procedures for receiving and processing civil rights complaints within FNS programs
- Documentation for annual civil rights training for staff
- Accommodating students with special dietary needs



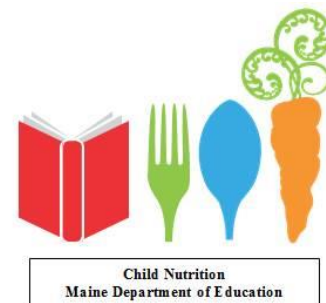
General Program Compliance

Food Safety



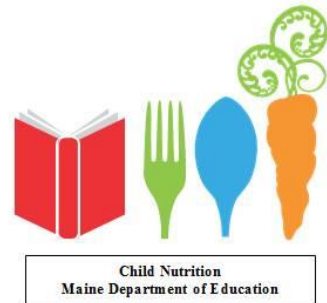
On-Site Documentation

- Food Safety Plan (SOP's):
 - Should be customized for each site
 - Customizable sample from ICN (NFSMI)
- Recordkeeping: Temperature logs, calibration logs
- Certified Food Protection Manager (ServSafe)



On-Site Documentation

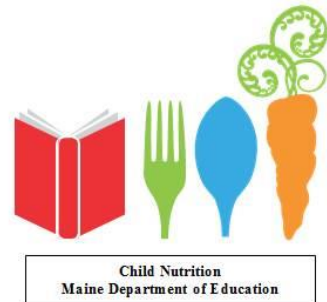
- Health Inspections
 - Must post recent health inspection in visible location (post a copy, not the original)
 - Keep on file old health inspections
 - USDA requires two per year.



On-Site Observations

Kitchen & Storage areas

- Proper personal hygiene- refer to SOP
- Cleaning/sanitizing procedures
- Food stored 6 inches off the floor
- Ghost trays - are required by DOE



Local Wellness Policy

Off-site

- Off-site Assessment Tool: #1000-1006
- Submit copy of current wellness policy



On-site

- Validate policy is implemented



Does Your Wellness Policy Measure Up?

- Where can the policy be found?
 - *Must be available to for public view*
 - Example: - Online
 - When was last updated/assessed?
 - *Policies must be assessed every three years*
- For:
- Compliance
 - Progress for meeting goals



Does Your Wellness Policy Measure Up?

- Measurable goals for:
 - *Nutrition Promotion*
 - *Nutrition Education*
 - *Physical Activity*
 - *Other school-based activities for student wellness including:*
 - Food Items sold to students meet Smart Snacks standards
 - Addresses foods and beverages not sold to students during the school day (e.g. classroom parties and snacks)



Does Your Wellness Policy Measure Up?

The Wellness Policy must address food and beverage marketing.

Brand-specific advertising of food or beverages is prohibited in school buildings or on school grounds except for food and beverages meeting standards for sale (Smart Snacks) or distribution on school grounds in accordance with rules adopted under subsection 2. For the purposes of this subsection, "advertising" does not include advertising on broadcast media or in print media such as newspapers and magazines, clothing with brand images worn on school grounds or advertising on product packaging.



Does Your Wellness Policy Measure Up?

-Have a team in place for the development, implementation, review of the policy.

The team may include:

Parents

School Food Service

Administrators

Parents

Students

Health Professionals

School Board members

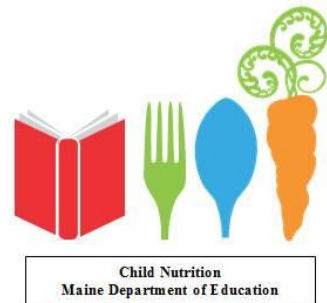
-Designated one school official to ensure the district complies with the wellness policy



Does Your Wellness Policy Measure Up?

Finally!

- Inform and update the public on the content and implementation, including progress made in meeting the goals of the policy.



Resources

Maine DOE - Child N x Free and Reduced P x New Gallery - Orcut x

www.maine.gov/doe/nutrition/resources/index.html

Apps MDOE CN NEO v1.9.1.4 ICN Pcr Train USDA FBG USDA Recipes

Agencies | Online Services | Help | Search Maine.gov

Maine Department of Education

Maine DOE Home Students & Families Teachers Administrators Commu

Home → Child Nutrition → Resources

Child Nutrition Home

Programs

Online Claims

Forms

Data & Reporting

Financial

Laws & Rules

Resources

Calendar of Events

Contact

Resources

Handbooks, Guides and Manuals

- [After School Snack Program Guide](#) (DOC,
- [Adult Pricing Guide](#) (PDF, 38KB)
- [Back to Basics Maine Handbook](#) (pdf)
- [Contracting with Food Service Manager](#)
- [Eligibility Manual for School Meals 2017](#). F School Lunch Program and the School Bre
- [Food Buying Guide](#). Link to USDA; current specific contribution each food makes tow
- [Fresh Fruit and Vegetable Program Handb](#)
- [Indirect Costs Guidance](#). Link to USDA; gu
- [Lunch Meal Pattern Questions and Answer](#)
- [Maine Eligibility Quick Reference Guide- S](#)
- [Maine Food Code](#) (DOC, 497KB)
- [Montana's Summer Food Service Program](#)
- [Offer versus Serve Manual](#). Link to USDA
- [School Food and Produce Safety Guides \(/](#)
- [Standard Operating Procedures provided b](#)
- [Summer Food Service Program Handbook;](#)
- [USDA Foods Crediting Guide 2015-16](#). (PC
- [USDA Food Distribution Manual for Maine](#).
- [USDA Guidance and Handbooks](#). Link to U

and Reduced P x New Gallery - Orcut x

/doe/nutrition/resources/index.html

L4 ICN Pcr Train FBG USDA Recipes Certification of C Title 20-A, §6662 Homeless Liaison ANC 2015 - Train Other box

- [Montana's Summer Food Service Program Activity Book](#)
- [Offer versus Serve Manual](#). Link to USDA
- [School Food and Produce Safety Guides \(USDA\)](#). Link to USDA
- [Standard Operating Procedures provided by NSFMI](#)
- [Summer Food Service Program Handbooks](#). Link to USDA
- [USDA Foods Crediting Guide 2015-16](#) (PDF, 281KB)
- [USDA Food Distribution Manual for Maine](#) (PDF, 303KB)
- [USDA Guidance and Handbooks](#). Link to USDA

Local Wellness Policy

- [Does Your Wellness Policy Measure Up](#) (PDF, 410KB)
- [Wellness Policy Rule Summary 2016](#) (PDF, 76KB)

Smart Snacks

- [Smart Snacks Calculator](#)
- [Smart Snacks in Schools Flowchart](#)
- [Smart Snacks in Schools](#) link to USDA; tools and resources are available to help schools identify food items that meet Smart Snacks criteria
- [Smart Snacks Rule Summary 2016](#) (PDF, 124KB)

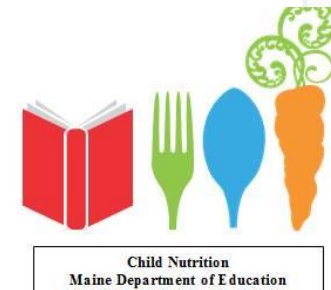
Special Dietary Needs

Children with food allergies, diabetes, disabilities, and other conditions requiring modifications to school meals are entering Maine schools every year. The following resources are provided to aid schools in planning, preparing, and serving all Maine students so they can remain safe and healthy.

- [Accommodating Children with Special Dietary Needs in School Nutrition Programs](#) link to USDA manual
- [Approved Milk Substitutes](#)
- [Food Allergies in Schools](#) link to U.S. Centers for Disease Control; includes food allergies overview, symptoms, treatment and prevention and guidelines documents
- [Fluid Milk & Substitutions - CACFP 17-2016](#) (pdf)
- [Handbook for Children with Special Food and Nutrition Needs](#) provided by the National Food Service Management Institute
- [Quick Guide: Accommodating Special Dietary Needs in School Nutrition Programs](#) (PDF, 271 KB)
- [Special Needs Fact Sheets](#) link to NSFMI web-based fact sheets providing concise information to assist child nutrition professionals in meeting children's special nutrition needs.
- [Voluntary Guidelines to Manage Food Allergies in Schools and Early Childhood Care and Education Programs](#). Link to CDC

Training

- [Child Nutrition Events](#) Information on upcoming events of interest to school food service professionals.
- [Maine DOE Professional Development Calendar](#) All DOE professional development hosted by the Department



Smart Snacks/Competitive Foods

Standards that pertain to any food and beverage sold to students at school during the school day.

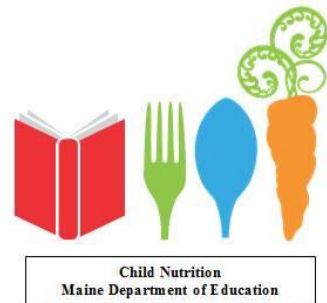
Including:

- a' la carte items
- vending machines
- school store



Smart Snacks

- USDA – Guide to Smart Snacks in School
- https://fns-prod.azureedge.net/sites/default/files/tn/USDA_SmartSnacks.pdf



Smart Snacks Standards for Snacks and Entrée's

Nutrient	Snack	Entrée
Calories	200 calories or less	350 calories or less
Sodium	200 mg or less	480 mg or less
Total Fat	35% of calories or less	35% of calories or less
Saturated Fat	Less than 10% of calories	Less than 10% of calories
Trans Fat	0 g	0 g
Sugar	35% by weight or less	35% by weight or less



Beverages

What are the Smart Snacks Standards for Beverages?

Water



Plain, with or without carbonation

No Limit

Milk

Unflavored low-fat, unflavored fat-free, or flavored fat-free milk; milk alternatives as permitted by the National School Lunch Program/School Breakfast Program



Elementary School



Middle School



High School

Juice

100% fruit or vegetable juice, with or without carbonation



Remember:
Sizes differ by grade grouping

Elementary
Middle
High School

With the exception of plain water –
w/without carbonation, there is no
size limit no size limit



Low- and No-Calorie Beverages (High School Only)

Low- and no-calorie beverages, with or without caffeine and/or carbonation; calorie-free, flavored water



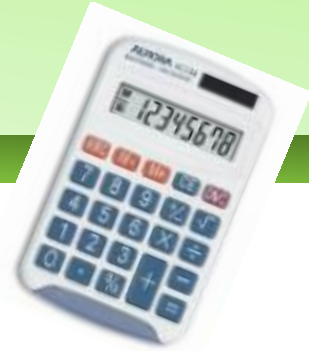
“Lower Calorie” Maximum 40 calories/8 fl oz. Maximum 60 calories/12 fl oz. (Equivalent to 5 calories per fluid ounce).



“No Calorie” Less than 5 calories/8 fl oz. Maximum 10 calories/20 fl oz.



Alliance for a Healthier Generation Web Resources



Smart Snacks Calculator

(<https://foodplanner.healthiergeneration.org/calculator/>)

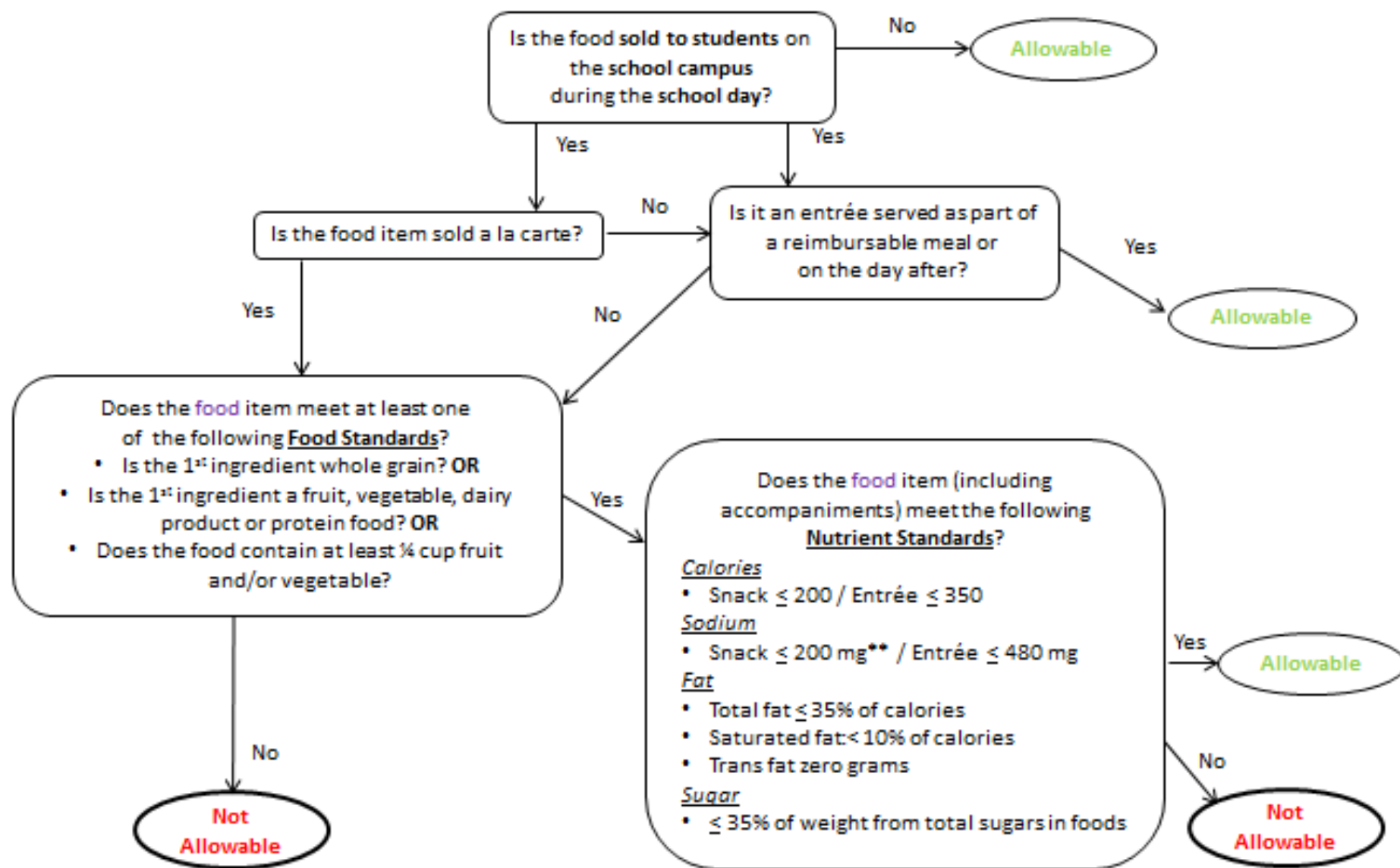
List of foods that have been predetermined Smart Snacks compliant.

<https://foodplanner.healthiergeneration.org/products>)



Smart Snacks in School

Foods Flowchart



NUTRIGRAIN



Kellogg's® Nutri-Grain® Soft
Baked Breakfast Bars Strawberry

Serving size **37g**
Calories: **120**
Total Fat: **3g**
Saturated Fat: **.5**
Trans: **0g**
Sodium: **125mg**
Sugar: **11g**

Whole Grain Oats, Enriched Flour,
Whole Wheat Flour, Vegetable Oil,
Sugar,



NUTRIGRAIN

My Product is a ...

- ☒ a) **Snack** 
- ☐ b) **Side** 
- ☐ c) **Entree** 
- ☐ d) **Beverage** 






Serving size **37g**
Calories: **120**
Total Fat: **3g**
Saturated Fat: **.5**
Trans: **0g**
Sodium: **125mg**
Sugar: **11g**

**Whole Grain Oats, Enriched Flour,
Whole Wheat Flour, Vegetable Oil,
Sugar,**



NUTRIGRAIN

Is the first ingredient* of your product a ...

- ☐ a) Fruit 
- ☐ b) Vegetable 
- ☐ c) Dairy 
- ☐ d) Protein food 
- ☒ e) Whole Grain 
- ☐ f) None of the above

Serving size 37g
Calories: 120
Total Fat: 3g
Saturated Fat: .5
Trans: 0g
Sodium: 125mg
Sugar: 11g

Whole Grain Oats, Enriched Flour,
Whole Wheat Flour, Vegetable Oil,
Sugar,



NUTRIGRAIN

Nutrition Facts

Serving Size oz (about g) ⓘ

Servings Per Container

Amount Per Serving

Calories

Calories from Fat

Total Fat (g)

Saturated Fat (g)

Trans Fat (g)

Sodium (mg)

Carbohydrates

Sugars (g)

Serving size **37g**

Calories: **120**

Total Fat: **3g**

Saturated Fat: **.5**

Trans: **0g**

Sodium: **125mg**

Sugar: **11g**



NUTRIGRAIN

✓ **Your product is compliant!**

Your whole grain product meets all nutrient standards for entrees or snack foods.

Brand

Serving Size

37.00 g

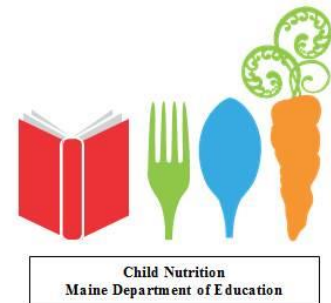
Product

First Ingredient



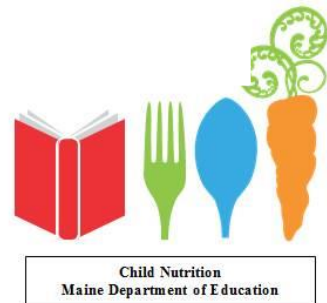
Common Findings

- Mixed grade schools – must follow most restrictive guidelines
- Non-compliant products
- Documentation that products are compliant
- Calories not posted at point of decision
- Goals listed are not measureable



SFA On-Site Monitoring

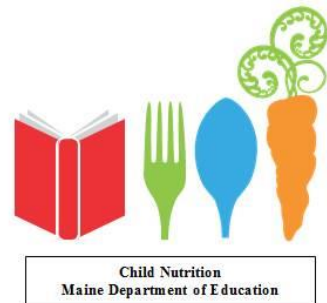
- Review of the counting and claiming system
- For districts with 2 or more schools
 - 50% of the schools that operate SBP
 - All sites with NSLP
- Prior to Feb 1st
- Implement any needed corrective action
- Sample form available on our website



Reporting and Record Keeping

Records must be kept for 3 years plus current!
(menus, production records, student applications...)

Financial records must be kept for 7 years



Professional Standards

Hiring and training standards to ensure that school nutrition program personnel have the knowledge and skills to manage and operate the programs successfully.

- How is staff training being tracked?
- Is it in relevant areas?
- Are there other school staff that assist the school nutrition program?



Professional Standards

Off-site



On-site

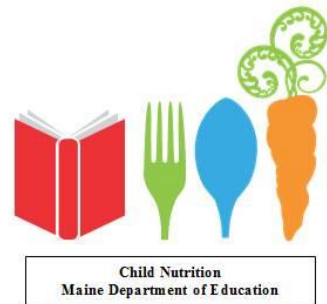
- List of employees paid by the SN Account
- # hours worked
- Summary of training to date
- Plan for the year

- Validate training documentation for current/prior year



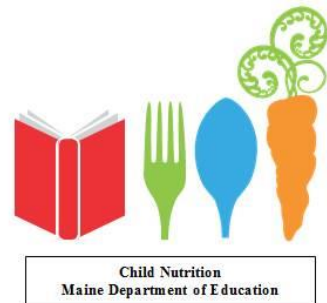
Other Program Reviews

- School Breakfast Program
- Fresh Fruit & Vegetable Program
- Afterschool Snack Program
- Special Milk Program



School Breakfast Program

- At the beginning of each school year, notification to households that this program is available.
- Review of offsite paperwork
- Onsite observation
 - Meal offered
 - Accountability



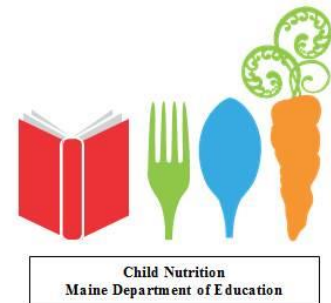
Fresh Fruit and Vegetable Program

- Determine if FFVP guidelines are met
- Documentation is kept- invoices
- Widely publicized in school
- Food safety & sanitation
 - How are leftovers handled?
- Are you budgeting properly?
 - Visit our FFVP reports in NEO



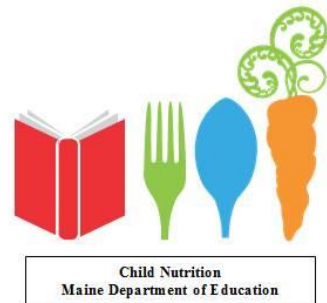
After School Snack Program

- Train staff that are overseeing the program and follow up
- Accountability is taken once snack is received
 - 2 different components = 1 snack
- Fruit/Vegetable offered is $\frac{3}{4}$ cup serving
- Self-Review twice a year
 - First 4 weeks
 - Prior to end of school year
 - Document



Special Milk Program

- Available only to half- day Pre-K and K who do not have access to breakfast or lunch
- Eligibility documentation must be kept
- Checklist by name if not all students qualify as free
 - Track number of free and paid milks



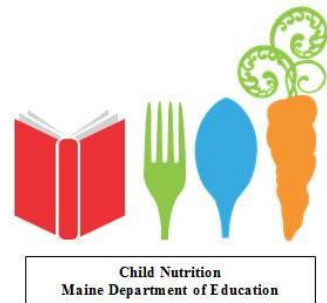
Post Review Activities

- Exit Conference with Superintendent/Designee
 - Review observations and findings
 - Potential Fiscal Action
 - Corrective Action (if needed)
- Administrative Review Report (& Corrective Action form) sent within 30-60 days
 - Emailed and mailed



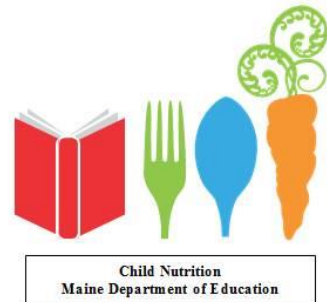
Corrective Action

- Any findings will result in corrective action
- Corrective action form outlining steps to correct issue in the future:
 - To be submitted by deadline
 - Signed by Superintendent



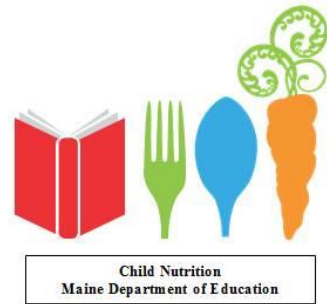
Corrective Action & Final Letter

- State Agency reviews submitted corrective action
 - Is it complete?
 - Does it resolve the identified finding/s?
- If sufficient, a final letter sent to close review



Finding vs. Observation

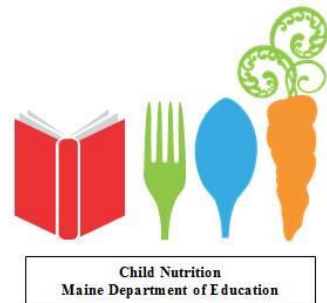
- All findings go on corrective action form
 - If corrected immediately still goes on form
- Not all observations require corrective action
 - Put in report, not on corrective action form
 - Purpose is to draw attention to an area
 - i.e. food waste



Fiscal Action

What is fiscal action?

- Recovery of overpayment
 - Disallowance of meals
-
- Automatically calculated for meal application/benefit issuance errors and missing meal components



Repeat Findings

- State Agency must assess fiscal action:
 - Missing vegetable subgroups over the course of the week
 - Only one type of milk is offered
- State Agency may assess fiscal action:
 - Insufficient food quantities and/or whole grain foods



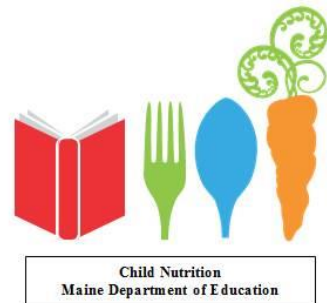
Resources

Admin Review Checklist

Child Nutrition website- Review Information

<http://www.maine.gov/doe/nutrition/review/index.html>

DOE Staff



Questions?

